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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE: Rafael R. Almonte

Case No.: 18-16642/JNP
Chapter 13

**NOTICE OF MOTION TO APPROVE APPLICATION TO PARTICIPATE IN U.S.B.C.
LOSS MITIGATION PROGRAM OUTSIDE OF THE PRESCRIBED TIME**

Hearing Date: May 29, 2018 @ 10:00 a.m.

TO:

Isabel Balboa
Chapter 13 Trustee
Cherry Tree Corporate Center
535 Route 38, Suite 580
Cherry Hill, NJ 08002

AND INTERESTED CREDITORS
see attached service list

PLEASE TAKE NOTICE that on the 29th of May, 2018 at 10:00 a.m. the undersigned, attorney for Debtor, will make application to this Honorable Court for an Order to Approve Application to Participate in U.S.B.C. Loss Mitigation Program.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the attached Certification of Rafael R. Almonte, exhibits annexed hereto, the arguments of counsel and such other and further proofs as may be adduced at the hearing hereof.

PLEASE TAKE FURTHER NOTICE that the moving party believes that no brief is necessary in support of the within application due to the fact that the matter involves no complex issues of law or fact.

PLEASE TAKE FURTHER NOTICE that the undersigned hereby waives oral argument of this matter.

PLEASE TAKE FURTHER NOTICE that if you wish to contest the within Motion, you must file opposition with the office of the Clerk of the Bankruptcy Court, and serve the undersigned, 7 days in advance of the aforesaid hearing, your responding papers stating with particularity the basis of your opposition to the within Motion. A copy of the proposed Order which is sought is annexed hereto and made a part hereof.

Dated: 5/8/2018

/s/ Seymour Wasserstrum
Seymour Wasserstrum, Esquire
Attorney for Debtor